

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JENNIFER MILLER, EMAD AL-KAHLOUT, JUMA
LAWSON, PHILIP SULLIVAN, JOSE GRINAN,
KELLY KIMMEY, KIMBERLY HALO, and HAMADY
BOCOUM, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., and AMAZON LOGISTICS,
INC.,

Defendants.

NO. 2:21-cv-00204-BJR

**JOINT MOTION AND [PROPOSED] ORDER
REGARDING CASE DEADLINES**

JOINT MOTION

The Second Amended Complaint having been filed and Defendants having withdrawn their pending Motion to Compel Arbitration and Stay, the parties, by and through their undersigned counsel, respectfully request that the Court: (1) grant Defendants until June 23, 2021 (three weeks after the Second Amended Complaint was filed) to file a renewed motion to compel arbitration based on the Second Amended Complaint; (2) grant Defendants leave to file a twenty-page brief in support of that motion; and (3) grant a stay of deadlines under Fed. R. Civ. P. 26(a) and Fed. R. Civ. P. 26(f), including those deadlines set forth in the Court's Order of March 15, 2021 (ECF Dkt. No. 13).

JOINT MOTION AND [PROPOSED] ORDER REGARDING CASE
DEADLINES

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As grounds for this motion, the parties state:

1. Plaintiffs filed the Second Amended Complaint on June 2, 2021.

2. Also on June 2, 2021, Defendants filed a notice of withdrawal of their Motion to Compel Arbitration and Stay (ECF Dkt. No. 28), so that they could refile a motion to compel arbitration tailored to the claims and allegations in the Second Amended Complaint.

3. The parties have agreed to a deadline of three weeks after Plaintiff filed the Second Amended Complaint for Defendants to file a motion to compel arbitration (or otherwise respond to the Second Amended Complaint).

4. Accordingly, the parties request that the Court grant Defendants an extension until June 23, 2021, to file their response to the Second Amended Complaint (which will be a motion to compel arbitration).

5. Defendants also request that the Court allow Defendants to file a twenty-page brief in support of their motion to compel arbitration, to allow Defendants sufficient space to address the grounds for compelling the newly-added Plaintiffs' claims to arbitration.

6. Plaintiffs assent to the requested extension of Defendants' page limit.

7. Finally, Defendants request that the Court grant a stay of the deadlines set forth in the Court's Order of March 15, 2021 (ECF Dkt. No. 13) and Fed. R. Civ. P. 26(a) and 26(f) while Defendants' motion is pending.

8. As grounds for this request, Defendants state that in the interest of not wasting the time and expense of the parties and the Court, discovery and all related submissions should be stayed pending resolution of the motion to compel arbitration.

9. Plaintiffs consent to the requested stay of these deadlines.

Accordingly, the parties respectfully request that the Court grant this motion and enter the proposed Order filed herewith.

RESPECTFULLY SUBMITTED AND DATED this 3rd day of June, 2021.

FAIR WORK, P.C.

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and Amazon Logistics, Inc.*

ORDER

IT IS SO ORDERED.

DATED this ____ day of _____, 2021.

HONORABLE BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT JUDGE